



DEPARTMENT OF CONSERVATION

Managing California's Working Lands

DIVISION OF OIL, GAS, & GEOTHERMAL RESOURCES

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November 16, 2012

David Albright, Manager
Ground Water Office
United States Environmental Protection Agency
75 Hawthorne Street
San Francisco, CA 94105-3901

Dear Mr. Albright:

The Division of Oil, Gas, and Geothermal Resources (Division) has reviewed the California Class II UIC Program Review report, prepared by Horsley Witten Group, Inc. (the Horsley Report), and has developed a plan to address the concerns and recommendations referenced in the report. As we have previously discussed, the Division began to evaluate its Underground Injection Control (UIC) program in 2009 with the hopes of bringing the program into conformance with state laws and regulations. Although we have improved our UIC program, and continue to evaluate it, the Division is aware that more work is required.

In your letter dated July 18, 2011, US EPA requested an action plan that includes clarification, improved procedures, and consistent standardized implementation in several areas, including:

- UIC staff qualifications;
- annual project reviews;
- mechanical integrity surveys and testing;
- inspections and compliance/enforcement practices and tools;
- idle well planning and testing program;
- financial responsibility requirements; and
- plugging and abandonment requirements.

Attached, please find the Division's plan to address the concerns of the US EPA and to identify those areas where the Division can improve its UIC program to more fully advance the objectives of the Safe Drinking Water Act. The Division views this action plan as a living document, which can be updated to incorporate any additional needed changes.

David Albright
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The Division looks forward to continuing our long-standing partnership with US EPA in protecting California's water resources. This plan will provide guidance as we update our UIC Program. We welcome your feedback and discussions regarding the elements in this action plan.

Sincerely,

A handwritten signature in black ink, appearing to read "Tim Kustic", with a stylized flourish at the end.

Tim Kustic
State Oil and Gas Supervisor

cc: Mark Nechodom, Director, Department of Conservation
Rob Habel, Chief Deputy
Dan Wermiel, Technical Program Manager
Jerry Salera, UIC Program Manager